

EXHIBIT 11

WITNESS DECLARATION OF MARTHA WEH

Date: December 14, 2022

Re: Mikhaylova v. Bloomingdale's Inc., et al 19-CV-8927

1. My name is: Martha Weh
2. My email address is: martha.weh@gmail.com
3. I have worked side by side with Kristina Mikhaylova at the Chanel department within Bloomingdales, 59th street location in NYC.
4. We started working together in 2016.
5. Kristina is super friendly and loved talking to everyone. Some however took advantage of her niceness.
6. On a daily basis one of the head of security from Bloomingdales named Bobby Booker would stop by into Chanel to say hello and unwelcomely start a conversation with Kristina.
7. Bobby had many times said sexually inappropriate things to Kristina.
8. When speaking to her he would come in very close proximity and stare her straight in the eyes as though he was undressing her. She would try to move away but he would always come closer.
9. From my understanding Bobby was married. Bobby always made comments that it was ok to cheat and explore a side relationship.
10. I used to always notice that Kristina felt extremely uncomfortable which is why I always tried to defend her and stop him from continuing. This was witnessed each time that I worked with Kristina. Bobby didn't seem to take no for an answer and always tried.

DECLARATION

I, the undersigned, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

martha weh
martha weh (Dec 14, 2022 23:51 EST)

Martha Weh

Date Dec 14, 2022

WITNESS AFFIDAVIT OF martha weh

Final Audit Report

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